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June 6, 2019

VIA CM/ECF

Honorable Valerie E. Caproni
United States District Court for the
Southern District of New York
United States Courthouse
40 Foley Square
New York, New York 10007

Re: HAHA Global, Inc., et al. v. Barclays, Case No. 1:19-cv-04749

Dear Judge Caproni:

We represent the defendants and related parties in this action, and we write to call the Court's attention to ongoing misconduct by the Plaintiff.

As the Court may recall, the present action involves a purported claim, pursued *pro se*, to recover \$450 billion on the basis of certain of unexplained "transfers" that are alleged to give rise to undefined and unexplained antitrust violations. (*See* Dkt. 1-1.) Among other deficiencies inherent in the action is the fact that the corporate plaintiff, HAHA Global, Inc., has sought to pursue these claims without legal representation in violation of long settled law. (*See id.*; Dkt. 5 at 12-13.)

Compounding this issue, however, is the fact that the Plaintiff continues to directly contact Barclays employees with false and harassing communications, despite clear written direction from Barclays to cease such activities. (*See* Ex. A; Ex. B.) Not surprisingly, a number of those communications occurred just following the filing of the Motion to Dismiss in this matter. (*See* Ex. C.)

We do not want to burden the Court with extraneous issues. It is nonetheless our judgment that only Court intervention will be effective on this issue. We respectfully request, therefore, that the Court issue an order directing the Plaintiff to cease any and all communication with any person in any way affiliated with Barclays except by way of communication with counsel.

Sincerely,



Sean R. O'Brien

cc: Ali Aghaei, Chief Executive Officer
HAHA Global Inc. (via Federal Express)